

Exhibit 1



NATIONAL COURT ADMINISTRATION
REPUBLIC OF KOREA

219 SEOCHO-DAERO, SEOCHO-GU, SEOUL, KOREA, 06590
Tel: 82-2-3480-1734, Fax: 82-2-533-2824

Jan. 12, 2022
Our Ref: **2022-F-53**

CENTRAL AUTHORITY FOR USA

Office of International Judicial Assistance
U.S. Department of Justice
1100 L Street, NW, Room 8102
Washington, D.C. 20005
United States of America

To whom it may concern,

The National Court Administration of the Republic of Korea presents its compliments to the U.S. Department of Justice and has the honour to transmit a request seeking assistance for taking of evidence under the *Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters*.

Please send all documentation concerning execution of the abovementioned request directly to the National Court Administration to the following address :

**National Court Administration
(Attn: Director of International Affairs)
219 Seocho-Daero, Seocho-Gu,
Seoul 06590
REPUBLIC OF KOREA**

Yours sincerely,

LEE Joo Hyung
Director of International Affairs
National Court Administration

FEB 15 2022

CIV-189-34-22-4

Registered No. 2021-3345

CERTIFICATE



GNS TRANSLATION & ADMINISTRATION OFFICE

#1405 Daeil Bldg, 12, Insadong-gil, Jongno-gu, Seoul, Korea

Request Letter pursuant to a civil or commercial overseas evidence search covenant

Note: According to the first sentence of Article 4, this request letter shall be prepared in the language of the entrusted authority to execute it, or a translation in that language shall be attached.

However, English, French and other languages are permitted as per the provisions of the second and third sentences.

To avoid confusion, please fill in the name of each month when writing the dates. Please attach a copy after completing the original..



1. Sender

Court Administration Office
(To: International Tribunal Office)
219, Seocho-daero, Seocho-gu, Seoul, South Korea
137-750

2. Central authority of entrusted country

International Legal Assistant Office
of U.S. Department of Justice
1100 L Street, NW, Room 8102
Washington D.C. 20005
United States of America

3. The destination of the executed request letter

Court Administration Office
(To: International Tribunal Office)
219, Seocho-daero, Seocho-gu, Seoul, South Korea
137-750

4. Please fill in the specific date by which you want to receive a reply to this request for the entrusted authority.

Date

(Fill in if necessary)

Reason for imminent reply*

(Fill in if necessary)

*If not required, please delete

In accordance with Article 3 of the Covenant, the undersigned applicant submits the following request letter.

5. 1

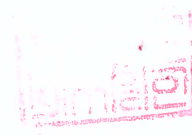
Entrusting judicial authority
(Paragraph 1 of Article 3)

(Name and Address of Entrusting Court)
Seoul Central District Court
157 Seocho Central Road, Seocho-gu, Seoul, R.O.K.

2

Competent jurisdiction
authority to execute
(Paragraph 1 of Article 3)
(If unknown, please don't fill
in)

(Request status)



3

Case name and number

(Required) Litigation of claim for compensation for
damage, 2021Gaso2009164

6. Names and addresses of the parties involved and attorneys (including the attorneys in
the entrusted country*)(Paragraph 2 of Article 3)

1 Plaintiff

(Required) **KIM JI YEON**

Attorney

(Required, if any) Attorney **SONG HAE MI**

2 Defendant

(Required) PPKKa

Attorney

(Required, if any)

3 Others

(Required, if any)

Attorney

(Required, if any)

7. 1
The nature of the
proceedings (divorce,
paternity, breach of contract,
product liability; etc.)
(Paragraph 3 of Article 3)

(Required) Litigation of claim for compensation for
damage

2
Summary on the litigation
(claim)

(Required) The plaintiff has appeared on TV, including
posting photos and articles related to the issue of corset
removal on YouTube and Instagram, and interviewing
media. The defendant, as a YouTube channel operator,
posted a YouTube video on April 11, 2020 and posted a
video of the plaintiff, and made derogatory and insulting
comments about the plaintiff. Accordingly, the plaintiff
claims 30 million won in compensation for damage caused
by the defendant's illegal acts.

3
Summary on Answers and
Counterclaims

(Fill in if necessary)

2022
5/18/22
KIMIAES

4
Other information and
documents required*

(Fill in if necessary)

8. 1
Evidence to acquire and other
judicial disposition to execute
(Paragraph 4 of Article 3)

(Required)
Fact inquiry
1. Defendant's YouTube sponsorship account
2. Defendant's address
3. Contact information such as the defendant's phone
number
* Specific notes : Youtube ID: ppkka.hello@gmail.com ,
Contribution URL: <https://toon.at/donate/ppkka>

2
Purpose of requesting
evidence or judicial action

(Required)
To identify the person concerned by verifying the personal
information of the defendant.

9.
Identity and address of the
person to be interrogated*
(Paragraph 5 of Article 3)*

(Fill in if necessary)

10.
Questions to the person to be
interrogated or explanation of the
subject matter (main content) to be
interrogated (Paragraph 6 of Article 3)*

(See the attached list)

(Fill in if necessary)

11.
Documents or objects to be
interrogated for evidence
(real estate, movable assets, etc.)
(Paragraph 7 of Article 3)*

(Fill in if necessary)

12.
Requirements under which
evidence shall be presented by
oath or pledge and the special
form to be used)
(Paragraph 8 of Article 3)*

(If it is not possible to interrogate evidence by the
method of application, please indicate whether
you want to take evidence even in the local
way.)

(Fill in if necessary)

13.
Special methods or procedures
to be followed
(e.g. oral or written, spoken or
written, transcribed records or
summaries, counter intro gation,
etc.)
(Paragraph 9 of Articles 3,
Article 9)*

(If it is not possible to interrogate evidence by the
method of application, please indicate whether
you want to take evidence even in the local
way.)

(Fill in if necessary)

14.
Request to inform the party
concerned or agent of the time
and place to execute, and the
identity and address of the
person to be informed
(Article 7)*

(Fill in if necessary)

15.
Request for the appearance or
participation of a judge from the
entrusting authority when
executing the request
letter(Article 8)*

(Fill in if necessary)

16.
Privileges or obligations to refuse
to present evidence under the law
of the entrusting country
(Paragraph 2 of Article 11)*

(Please attach the copy of relevant laws or regulations.)

(Fill in if necessary)

17.
Subject of reimbursement for
charges and expenses under Articles
14 and Article 26*

(Identity and address)

(Fill in if necessary)

Request Date

2021. 12. 31.

**Signature and seal of the
requesting authority**

Judge Lee, Kyung-lin



* If not required, please delete

민사 또는 상사의 해외증거조사협약에 따른 요청서

주의사항 : 제4조 제1문에 의하여 촉탁서는 이를 집행할 수탁 당국의 언어로 작성하거나 그 언어로 된 번역문을 첨부하여야 합니다. 그러나 제2문, 제3문의 규정에 의하여 영어, 불어 그리고 다른 언어도 허용됩니다.

혼란을 피하기 위하여, 날짜를 쓸 때는 각 달의 이름을 쓰시기 바랍니다.

원본을 작성 후 사본 1부를 첨부하시기 바랍니다.

1. 발송처)

법원행정처
(수신처: 국제심의관실)
대한민국 서울시 서초구 서초대로 219
137-750

2. 수탁 국가의 중앙당국

미국 법무부 국제사법공조실
1100 L 거리, NW, 8102호
워싱턴 D.C. 20005
아메리카 합중국

3. 집행된 요청서의 수신처

법원행정처
(수신처: 국제심의관실)
대한민국 서울시 서초구 서초대로 219
137-750

4. 촉탁당국의 요청서에 대한 회신이 언제까지 도착하기를 바라는지 구체적인 날짜를 기재하시기 바랍니다.

날짜

(필요시 기재)

긴급을 요하는 이유*

(필요시 기재)

* 필요 없을 경우에는 삭제할 것.

협약 제3조에 따라 아래에 서명한 신청인은 다음의 촉탁서를 제출합니다.

5. 1 촉탁 사법 당국
(제3조 1)

(촉탁 법원 이름 및 주소)
서울중앙지방법원
대한민국 서울 서초구 서초중앙로 157

2 집행할 관할 당국(제3조 1)
(모르는 경우에는 기재하지
말 것.)

(요청된 상태)

3 사건의 이름과 번호

(필히 기재) 2021가소2009164 손해배상 청구의 소

6. 당사자 및 변호인들의 이름과 주소(수탁 국가내의 변호인들 포함*)(제3조 2)

1 원고

(필히 기재) 김지연

변호인

(있으면 필히 기재) 변호사 송혜미

2 피고

(필히 기재) 뽕가

변호인

(있으면 필히 기재)

3 그 외

(필요시 기재)

변호인

(필요시 기재)

* 필요 없을 경우에는 삭제할 것.

7. 1 절차의 성격(이혼, 친자, 계약위반, 생산물 책임, 기타 등등)(제3조 3)

(필히 기재) 손해배상 청구의 소

2 소장(청구)에 대한 요약

(필히 기재) 원고는 유튜브, 인스타그램 등에 탈코르셋 이슈 등과 관련하여 사진 및 글을 게시하고, 뉴스에 인터뷰하는 등 방송에 출연한 적이 있음. 피고는 유튜브 채널을 운영하는 자로서 2020. 4. 11. 유튜브 동영상을 게시하며 원고의 사진을 띄우고, 원고에 대한 비하적, 모욕적 발언을 하였음. 이에 원고는 피고의 불법행위로 인한 손해배상책임으로 위자료 3,000만 원을 청구함.

3 답변과 반소의 요약

(필요시 기재)

4 그 외 필요한 정보 및 문서*

(필요시 기재)

8. 1 취득할 증거 또는 이행 할 그 밖의 사법적 처분(제3조 4)

(필히 기재)

사실조회사항

1. 피고의 유튜브 후원계좌

2. 피고의 주소

3. 피고의 전화번호 등 연락처

* 참고사항 : 유튜브 ID : ppkka.hello@gmail.com,

후원 URL: <https://toon.at/donate/ppkka>



2 증거 또는 사법적 처분을 요청하는 목적

(필히 기재)

피고의 개인정보를 확인하여 당사자를 특정하기 위함.

9. 신문 받을 자의 신원과 주소* (제3조 5)*

(필요시 기재)

10. 신문받을 자에게 할 질문 또는 신문이 이루어질 소송물(주된내용)에 관한 설명(제3조 6)*

(첨부 목록 참조)

(필요시 기재)

11. 증거조사가 이루어질 서류나 물건
(부동산, 동산 등)(제3조 7)*

(필요시 기재)

12. 증거가 선서 또는 서약에 의하여
제출되어야 하는 요건 및 사용될
특별한 형식)(제3조 8)*

(신청하는 방식으로는 증거조사를 할 수 없을 시에, 현지의 방식대로라도
증거조사를 원하는지 명시하시기 바랍니다.)

(필요시 기재)

13. 따라야 하는 특별한 방식
또는 절차
(예: 말로 또는 글로, 말한 그대로
글로, 글로 옮긴 기록 또는 요약,
반대신문, 기타 등등)(제3조 9,
제9조)*

(신청하는 방식으로는 증거조사를 할 수 없을 시에, 현지의 방식대로라도
증거조사를 원하는지 명시하시기 바랍니다.)

(필요시 기재)

14. 촉탁서의 집행 시간과 장소를
관계 당사자 또는 대리인에게
알려 달라는 요청,
그리고 알려줘야 할 이의 신원과
주소(제7조)*

(필요시 기재)

15. 촉탁서의 집행시에 촉탁 당국
법관의 출석 또는 참여 요청
(제8조)*

(필요시 기재)

* 필요없을 경우에는 삭제할 것.

16. 촉탁국의 법에 의하여 증거제출을 거부할 특권이나 의무 (제11조 2)*

(관련된 법 또는 규정의 사본을 첨부 할 것.)

(필요시 기재)

17. 14조항과 26조항에 의한 요금과 비용의 상환 주체*

(신원 및 주소)

(필요시 기재)

요청 날짜

2021. 12. 31.

요청 권한자의 서명 및 인감

판사 이경린



* 필요없을 경우에는 삭제할 것.

등부 2021년 제 3345호

Registered No. 2021-3345

외 국 어 번 역 행 정 사 확 인 서

CERTIFICATE OF LICENSED
TRANSLATION

나는 첨부된 문서가 본 사무소에 의하여 번역이 되었으며 그 번역이 진실되고 원본과 일치한 것임을 증명한다.

I hereby certify that GNS CO.,LTD., translated the attached document.
The translation is true, correct and accurate to the original.

위 번역문은 원본과 일치하게 번역하였기에 대한민국 행정사법 제 20조에 의거하여 번역확인 증명서에 서명 날인 하였다.

Since the above translation was translated to match the original, the Certificate of Translation was signed and sealed in accordance with Article 20 of the Licensed Administrative Agent Act in the Republic of the Korea.

2021 년 12 월 21 일
위 사무소에서 인증한다.

This is hereby confirmed on this 21th day of December 2021 at this office.

대한행정사협회
등록번호 : 제 267호

Korean Association of Public Administration Lawyer
Registration Number : 267

羅 完 植

외국어 번역행정사
자격증 번호:15300000110



won.rik.Ra

Licensed Administrative Agent
License No.15300000110



지앤에스 번역행정사 사무소
서울 종로구 인사동길 12, 1405호(인사동, 대일빌딩)

GNS TRANSLATION & ADMINISTRATION OFFICE
#1405 Daeil Bldg, 12, Insadong-gil, Jongno-gu, Seoul,
Korea

Exhibit 2

UNITED STATES DISTRICT COURT

for the

_____ District of _____

Plaintiff

v.

Defendant)
)
)
)
)
)
)

Civil Action No. _____

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To:

(Name of person to whom this subpoena is directed)

☐ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Place:	Date and Time:
--------	----------------

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

*Signature of Clerk or Deputy Clerk*_____
Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* _____, who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* _____
 on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____
 _____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
 tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
 \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment A

YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material set forth below and pursuant to the terms and provisions set forth below:

1. Upon receipt of the subpoena, Google, Inc. shall promptly make a diligent search for the information contained in the Request Letter pertaining to “PPKKa,” an alleged YouTube channel operator, including, but not limited to, the following necessary information: (1) the sponsorship account for PPKKa, <https://www.youtube.com/channel/UCIE2hKVqycAuBKmXwawizEg>, which may include the channel or account’s “AdSense registration information”; (2) PPKKa’s address; (3) PPKKa’s contact information such as PPKKa’s telephone number; and (4) the registration information for ppkka.hello@gmail.com, an email account.
2. Within 30 calendar days from receipt of the subpoena by email, Google shall produce the information described in paragraph 1 above, to the extent it is available, along with a notarized verification signed under penalty of perjury to the Court-Appointed Commissioner, Douglas Johns, Assistant United States Attorney, notwithstanding any other paragraph or provision in this subpoena.
3. Google can produce the information described in paragraph 1 above directly to the Seoul Central District Court in Seoul, Republic of Korea, but the information in paragraph 1 must be sent to the address set forth directly below.

**National Court Administration
Atten: Director of International Affairs
219 Seocho-Daero, Seocho-Gu
Seoul 06590
Republic of Korea.**

If Google produces the information described in paragraph 1 directly to the Seoul Central District Court in Seoul, Republic of Korea, it must provide the Court-Appointed Commissioner, Douglas Johns, Assistant United States Attorney, with a certification attesting that it responded directly to the Korean Court within ten (10) days of the information described in paragraph 1 being produced directly to the Seoul Central District Court.

4. Absent an objection or motion for protective order filed prior to the expiration of Google’s 21-day notice period regarding the Application or subpoena served on Google, in response to the subpoena, Google shall produce the information described in paragraph 1 above, to the extent it is available, notwithstanding any other provision or paragraph in this subpoena.
5. Google will not disclose any information that would be inconsistent with its obligations under the federal law including, but not limited to, the Stored Communications Act.

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6. If Google requires an additional or modified uniform resource locator, “URL,” to process the subpoena, upon receipt of the requested updated or new URL from the Court-Appointed Commissioner, Douglas Johns, Assistant United States Attorney, Google will agree to provide the information responsive to the Request Letter within 30 calendar days, along with a notarized verification signed under penalty of perjury to AUSA Johns.